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12/02/2011

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91202227
Party	Defendant Leftridge, Douglas A.
Correspondence Address	LEFTRIDGE, DOUGLAS A. 7441 MINK HOLLOW RD HIGHLAND, MD 20777-9779  DLeftridge@gblsales.com
Submission	Answer
Filer's Name	Donald J. Walsh
Filer's e-mail	dwalsh@offitkurman.com
Signature	/S/
Date	12/02/2011
Attachments	Answer.pdf ( 5 pages )(11848 bytes )

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

UNDER ARMOUR, INC.

\* Opposition No. 91202227

\*

V.

\* Application No. 85200700
Mark: ARMOURADE

DOUGLAS A. LEFTRIDGE

\* Filing Date: December 17, 2010

\*\*

Applicant

\* \* \* \* \* \* \* \* \* \* \* \*

## ANSWER AND GROUNDS OF DEFENSE

Applicant, Douglas A. Leftridge, by and through his counsel, Donald J. Walsh and Offit Kurman, P.A., files this Answer and Grounds of Defense to the Notice of Opposition, and in response to the allegations states:

- Applicant admits the allegations set forth in Paragraph 1 of the Notice of Opposition.
- 2. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 2 of the Notice of Opposition and therefore denies same.
- 3. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 3 of the Notice of Opposition and therefore denies same.
- 4. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 4 of the Notice of Opposition and therefore denies same.
- 5. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 5 of the Notice of Opposition and therefore denies same.
- 6. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 6 of the Notice of Opposition and therefore denies same.

- 7. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 7 of the Notice of Opposition and therefore denies same.
- 8. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 8 of the Notice of Opposition and therefore denies same.
- 9. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 9 of the Notice of Opposition and therefore denies same.
- 10. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 10 of the Notice of Opposition and therefore denies same.
- 11. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 11 of the Notice of Opposition and therefore denies same.
- 12. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 12 of the Notice of Opposition and therefore denies same.
- 13. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 13 of the Notice of Opposition and therefore denies same.
- 14. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 14 of the Notice of Opposition and therefore denies same.
- 15. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 2 of the Notice of Opposition and therefore denies same.
- 16. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 16 of the Notice of Opposition and therefore denies same.
- 17. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 17 of the Notice of Opposition and therefore denies same.

- 18. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 18 of the Notice of Opposition and therefore denies same, but notes that the registrations speak for themselves.
- 19. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 19 of the Notice of Opposition and therefore denies same, but notes that the registrations speak for themselves.
- 20. Applicant admits the allegations set forth in Paragraph 20 of the Notice of Opposition.
- 21. Applicant admits the allegations set forth in Paragraph 21 of the Notice of Opposition.
- 22. Applicant admits the allegations set forth in Paragraph 22 of the Notice of Opposition.
- 23. Applicant denies the allegations set forth in Paragraph 23 of the Notice of Opposition.
- 24. Applicant admits to the allegations set forth in Paragraph 24 of the Notice of Opposition with respect to sports apparel only. Applicant denies the remaining allegations as set forth in Paragraph 24 of the Notice of Opposition.
- 25. Applicant denies the allegations set forth in Paragraph 25 of the Notice of Opposition.
- 26. In response to paragraph 26 of the Notice of Opposition, the Applicant incorporates by reference his responses to paragraphs 1 through 25 hereinabove.
- 27. Applicant denies the allegations set forth in Paragraph 27 of the Notice of Opposition.

- 28. Applicant denies the allegations set forth in Paragraph 28 of the Notice of Opposition.
- 29. Applicant denies the allegations set forth in Paragraph 29 of the Notice of Opposition.
- 30. Applicant denies the allegations set forth in Paragraph 30 of the Notice of Opposition.
- 31. In response to paragraph 31 of the Notice of Opposition, the Applicant incorporates by reference his responses to paragraphs 1 through 30 hereinabove.
- 32. Applicant denies the allegations set forth in Paragraph 32 of the Notice of Opposition.
- 33. Applicant denies to the allegations set forth in Paragraph 32 of the Notice of Opposition.
- 34. Applicant denies the allegations set forth in Paragraph 29 of the Notice of Opposition.

WHEREFORE, Applicant requests the Notice of Opposition be dismissed.

November 29, 2011

Date

/S/

Donald J. Walsh Offit Kurman, P.A. 8 Park Center Court, Suite 200 Owings Mills, MD 21117 (443) 738-1583 Attorneys for Applicant

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 29<sup>th</sup> day of November, 2011, I provided a copy of the Answer and Grounds of Defense, via the Court's electronic service, to: Matthew H. Swyers, 344 Maple Avenue West, Suite 389, Vienna, Virginia 22180.

S/

Donald J. Walsh
Offit Kurman, P.A.
8 Park Center Court, Suite 200
Owings Mills, MD 21117
(443) 738-1583
Attorneys for Applicant